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December 16, 2024

VIA ELECTRONIC CASE FILING

The Honorable Judge Julien X. Neals
United States District Judge
Martin Luther King Building & U.S. Courthouse
50 Walnut Street #4015
Newark, New Jersey 07102

Re: The Roman Catholic Diocese of Paterson, New Jersey, et al. v. United States Department of State, et al., Case 2:24-cv-08350-JXN-MAH

Dear Judge Neals:

This Firm acts as Counsel for Plaintiffs, the Roman Catholic Diocese of Paterson, New Jersey, Father Manuel Alejandro Cuellar Ceballos, Father Regin Nico Dela Cruz Quintos, Father Joemin Kharlo Chong Parinas, Father Armando Diaz Vizcara Jr., and Father Joseph Anthony Aguila Mactal ("Plaintiffs").

On November 11, 2024, Plaintiffs filed with the Court a Motion to Stay All Proceedings Through and Including December 31, 2024 (the "Motion"). ECF No. 18. Defendants, United States Department of State, United States Department of Homeland Security, United States Citizenship and Immigration Services, Antony Blinken, in his official capacity as Secretary of the United States Department of State, Alejandro Mayorkas, in his official capacity as Secretary of the United States Department of Homeland Security,

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and Ur Mendoza Jaddou, in her official capacity as Director of United States Citizenship and Immigration Services ("Defendants"), did not oppose the Motion. Id.

On December 12, 2024, the Court granted the Motion and ordered a stay of all proceedings up to and including December 31, 2024 (the "Order"). ECF No. 19. The Court further ordered the filing of a status report no later than December 16, 2024. Id. Plaintiffs, after consultation with Counsel for Defendant now submits this letter Status Report.

Since the Court's Order, Plaintiffs, through Counsel and others, have been working towards a compromise with members of several federal departments and agencies that would, if agreed upon, deem Plaintiffs' Complaint moot. As of today, however, there is not yet an agreement. Plaintiffs submit that negotiations are ongoing.

Unless this Court orders otherwise, Plaintiffs will file a status report on December 30, 2024. Further, if an agreement necessitates the extension of the stay in this matter, Plaintiffs will confer with Counsel for Defendants and file a motion requesting an extension on or before December 30, 2024.

Should you have any questions, please do contact either of the undersigned.

Thank you for your consideration.

Very Truly Yours,

NORRIS McLAUGHLIN, P.A.

/s/ Robert Mahoney
Robert Mahoney, Esquire

/s/ Raymond G. Lahoud
Raymond G. Lahoud, Esquire*
*Pro Hac Vice

Attorneys for Plaintiff

RM/RGL:rc

cc: Counsel of Defendants (via ECF)

SO ORDERED

s/Michael A. Hammer
Michael A. Hammer, U.S.M.J.

Date: 12/18/24